

From: Siciliano, Lorraine
Sent: Thursday, May 22, 2014 1:57 PM
To: Siciliano, Lorraine
Subject: CMS/ONC notification of proposed rulemaking and the VT Medicaid EHRIP
Attachments: 2014_05_20_PressReleaseProposedRule.pdf; NoticeOfProposedRulemaking2014-11944.pdf

To All VT Medicaid EHR Incentive Program Participants:

Earlier this week, CMS and ONC issued a notification on a proposed rule that would change EHR Incentive Program requirements for Program Year 2014.

The two areas of proposed program changes are:

1. Granting more flexibility for providers experiencing difficulties fully implementing 2014 Edition CEHRT:
 - Eligible Providers would be able to use EHRs that have been certified under the 2011 Edition, a combination of the 2011 and 2014 Editions, or the 2014 Edition.
 - Eligible Providers scheduled to attest to Stage 2 of meaningful use in Program Year 2014 would have various options to attest to an additional year of Stage 1 OR to a first year of Stage 2.
 - This flexibility would potentially be granted only to providers attesting that they could not fully implement 2014 Edition CEHRT for the reporting period in 2014 due to delays in 2014 Edition CEHRT availability.
 - **NOTE:** All providers still need 2014 Edition CEHRT to attest to adopting, implementing, or upgrading (A/I/U) for Program Year 2014.
2. Extending Stage 2 through 2016. Stage 3 would not begin until Program Year 2017.

The Vermont EHRIP Team is working with the multi-state MAPIR collaborative in analyzing the implications of the proposed changes and how to operationalize them.

After the **proposed** rule is published on May 23, 2014, there will be a 60-day period for public comment. There is no set date yet for the publication of the **final** rule.

The CMS Press release, which includes illustrative timelines and charts summarizing the two areas of proposed program changes, is attached and also available here:

<http://www.cms.gov/Newsroom/MediaReleaseDatabase/Press-releases/2014-Press-releases-items/2014-05-20.html>

The 28-page document containing the detailed language of the proposed rule change is attached, and also available here:

<https://s3.amazonaws.com/public-inspection.federalregister.gov/2014-11944.pdf>

We will keep our Vermont Medicaid EHR Incentive Program participants informed as we learn more about these changes.

In the meantime, the Vermont Medicaid EHR Incentive Program is accepting all Program Year 2014 applications from providers attesting with 2014 Edition EHR systems.

Please do not hesitate to contact us with any questions.

Thank you,
Lorraine

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